

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DONALD P. BOLAND and MARY A.	:	Civil Action No. 1:16-cv-03925-LLS
BOLAND, Individually and on Behalf of All	:	
Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiffs,	:	LEAD PLAINTIFF'S NOTICE OF MOTION
	:	AND UNOPPOSED MOTION FOR
vs.	:	PRELIMINARY APPROVAL OF
	:	SETTLEMENT
GERDAU S.A., et al.,	:	
	:	
Defendants.	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Stipulation of Settlement with exhibits, and all prior pleadings and proceedings had herein, Lead Plaintiff, by and through its attorneys, hereby moves the Court, before the Honorable Louis L. Stanton, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for entry of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, agreed upon by all parties: (1) granting preliminary approval of the proposed settlement; (2) certifying the Class solely for settlement purposes; (3) approving the form and manner of giving notice of the proposed

settlement to the Class; and (4) setting a hearing date for final approval thereof, and a schedule for various deadlines relevant thereto.

DATED: July 6, 2017

Respectfully submitted,

s/ Samuel H. Rudman

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Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Samuel H. Rudman, hereby certify that on July 6, 2017, I caused a true and correct copy of the attached:

Lead Plaintiff's Notice of Motion and Unopposed Motion for Preliminary Approval of Settlement

to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filings to all counsel registered to receive such notice.

*s/ Samuel H. Rudman*

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SAMUEL H. RUDMAN